

EXHIBIT B

From: [Thumim, Leron](#)
To: [Rudzin, Abby F.](#); [dlessler@kslaw.com](#); [jpelaez@kslaw.com](#); [jdycus@kslaw.com](#); [Martin, Bill](#); [cchoi@kslaw.com](#); [sandra.hauser@dentons.com](#); [nicholas.petts@dentons.com](#); [stephen.senderowitz@dentons.com](#); [timothy.storino@dentons.com](#); [Spencer Young](#)
Cc: [James Wes Christian](#); [Ardalan Attar](#); [Harrington](#); [Harrington Securities](#)
Subject: RE: Harrington v. CIBC -- 30(b)(6) Deposition Notices
Date: Thursday, May 16, 2024 8:30:01 PM
Attachments: [image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Hi Abby,

We can confirm that we are not available to depose Mr. Manzoni on May 23. Please let us know when in June Mr. Manzoni is available.

Best,



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From: Rudzin, Abby F. <arudzin@omm.com>
Sent: Thursday, May 16, 2024 3:56 PM
To: Thumim, Leron <lthumim@wbny.com>; dlessler@kslaw.com; jpelaez@kslaw.com; jdycus@kslaw.com; Martin, Bill <wmartin@omm.com>; cchoi@kslaw.com; sandra.hauser@dentons.com; nicholas.petts@dentons.com; stephen.senderowitz@dentons.com; timothy.storino@dentons.com; Spencer Young <SYoung@KSLAW.com>
Cc: James Wes Christian <jchristian@christianattarlaw.com>; Ardalan Attar <aattar@christianattarlaw.com>; Harrington <Harrington@wbny.com>; Harrington Securities <HarringtonSecurities@hsgllp.com>
Subject: RE: Harrington v. CIBC -- 30(b)(6) Deposition Notices

Please let us know by noon tomorrow if Harrington intends to depose Mr. Manzoni on May 23. It is not very courteous to ask him to hold his calendar any longer for no reason.

From: Rudzin, Abby F.
Sent: Wednesday, May 15, 2024 12:11 PM
To: 'Thumim, Leron' <lthumim@wbny.com>; dlessler@kslaw.com; jpelaez@kslaw.com; jdycus@kslaw.com; Martin, Bill <wmartin@omm.com>; cchoi@kslaw.com; sandra.hauser@dentons.com; nicholas.petts@dentons.com; stephen.senderowitz@dentons.com;

timothy.storino@dentons.com; Spencer Young <SYoung@KSLAW.com>

Cc: James Wes Christian <jchristian@christianattarlaw.com>; Ardalan Attar <aattar@christianattarlaw.com>; Harrington <Harrington@wbny.com>; Harrington Securities <HarringtonSecurities@hsgllp.com>

Subject: RE: Harrington v. CIBC -- 30(b)(6) Deposition Notices

Mr. Manzoni is available on May 23. Please confirm.

Abby

From: Thumim, Leron <lthumim@wbny.com>

Sent: Tuesday, May 14, 2024 2:14 PM

To: Rudzin, Abby F. <arudzin@omm.com>; dlessner@kslaw.com; jpelaez@kslaw.com; jdycus@kslaw.com; Martin, Bill <wmartin@omm.com>; cchoi@kslaw.com; sandra.hauser@dentons.com; nicholas.petts@dentons.com; stephen.senderowitz@dentons.com; timothy.storino@dentons.com; Spencer Young <SYoung@KSLAW.com>

Cc: James Wes Christian <jchristian@christianattarlaw.com>; Ardalan Attar <aattar@christianattarlaw.com>; Harrington <Harrington@wbny.com>; Harrington Securities <HarringtonSecurities@hsgllp.com>

Subject: RE: Harrington v. CIBC -- 30(b)(6) Deposition Notices

[EXTERNAL MESSAGE]

Hi Abby,

To be clear, is Merrill's position that it will not produce Steven Manzoni for deposition? And are you also speaking for CIBC in indicating that CIBC will not produce Sajjad Rashid for deposition?



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From: Rudzin, Abby F. <arudzin@omm.com>

Sent: Tuesday, May 14, 2024 11:44 AM

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Cc: James Wes Christian <jchristian@christianattarlaw.com>; Ardalan Attar

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<HarringtonSecurities@hsgllp.com>

Subject: RE: Harrington v. CIBC -- 30(b)(6) Deposition Notices

Hi Leron. So there is no confusion in the future, we do not agree that Harrington has the right to withdraw and re-serve deposition notices on the same witness – especially after we already gave you a date when the witness was available for his deposition. And of course Harrington cannot “reserve” rights it does not have. We will start working on dates for Messrs. Baebler and Ahmad.

O'Melveny

Abby F. Rudzin

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Cc: James Wes Christian <jchristian@christianattarlaw.com>; Ardalan Attar
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Subject: RE: Harrington v. CIBC -- 30(b)(6) Deposition Notices

[EXTERNAL MESSAGE]

Counsel,

Plaintiff is—while reserving all rights—withdrawing the deposition notices it has previously served on Tony Cancellara, Robert Maher, and Jeff Sundram. Please see the attached deposition notices for Sajjad Rashid and Steven Manzoni, as well as amended notices for Ron Persaud, Todd Baebler, and

Faisal Ahmad.

For the avoidance of all doubt, Plaintiff reserves all rights in withdrawing the notices it is today withdrawing—including the right to reissue these notices at any time or issue other notices, whether (i) on the basis of additional information learned as Defendants produce additional documents; (ii) due to an increase in the deposition limit, either due to agreement with Defendants or an order of the Court; or (iii) for any other reason.

Please let us know when Defendants are available to meet and confer regarding the times and locations of the currently-noticed depositions.



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From: Thumim, Leron

Sent: Friday, December 15, 2023 3:43 PM

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Cc: Pollack, Alan <APollack@wbny.com>; Ennis, Felicia <FEnnis@wbny.com>; Manzollillo, Sandy <SManzollillo@WBNY.COM>; James Wes Christian <jchristian@christianattarlaw.com>; Ardalan Attar <aattar@christianattarlaw.com>

Subject: RE: Harrington v. CIBC -- 30(b)(6) Deposition Notices

Counsel,

As discussed on our meet and confer just now, we are withdrawing our deposition notices for the following individuals without prejudice to reissue them:

- Todd Baebler
- Jeff Ennis
- Jason Le
- David Hecht
- Alex Taylor

Also, to confirm what we said on the meet and confer, we agree not to take any of the depositions of Merrill witnesses before January 2.

Best,



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Cc: Pollack, Alan <APollack@wbny.com>; Ennis, Felicia <FEnnis@wbny.com>; Manzolillo, Sandy <smanzolillo@wbny.com>; James Wes Christian <jchristian@christianattarlaw.com>; Ardalan Attar <aattar@christianattarlaw.com>
Subject: RE: Harrington v. CIBC -- 30(b)(6) Deposition Notices

Counsel: On behalf of plaintiff, please see the attached individual deposition notices.



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Cc: Pollack, Alan <APollack@wbny.com>; Marcucci, Matthew A. <MMarcucci@wbny.com>; Ennis, Felicia <FEnnis@wbny.com>; Manzolillo, Sandy <smanzolillo@wbny.com>; James Wes Christian <jchristian@christianattarlaw.com>; Ardalan Attar <aattar@christianattarlaw.com>

Subject: Harrington v. CIBC -- 30(b)(6) Deposition Notices

Counsel,

On behalf of Plaintiff Harrington Global Opportunity Fund, Ltd., please see the attached 30(b)(6) deposition notices.

Best,



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